

## SOUTH BROOKLYN LEGAL SERVICES

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**MEMO ENDORSED** March 17, 2008

Hon. Colleen McMahon  
District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



3/18/08

Re: Mary Kilbride v Merrill v. Merrill Lynch & Co, Inc. LTD  
Plan, et al, 07 Civ. 7092 (CM)

Dear Judge McMahon:

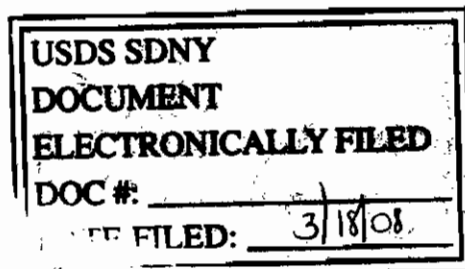
This is to respectfully request that the deadline for completion of discovery be extended thirty days with the hope that counsel for Defendant MetLife and I will be able, without the intervention of the Court, resolve their remaining differences concerning discovery requests. If this application is granted, it is further requested that the other deadlines also be extended thirty days.

Through discussions with counsel for MetLife and counsel for co-Defendant Merrill Lynch Disability Service Center (1) all issues concerning the Center's responses have been resolved, and (2) all issues with MetLife have been resolved except for those concerning one interrogatory and two document requests.

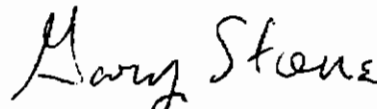
Counsel for Plaintiff and Defendant MetLife conferred informally and the latter agreed to speak to his client to explore a possible resolution of the remaining issues. Plaintiff has repeatedly extended Defendants' time to respond to the discovery requests. The deadline for completion of discovery, however, is tomorrow, necessitating this formal application.

Counsel for all of the Defendants have indicated their consent to such an extension.

Thank you for your consideration of this request.



Very truly yours,

  
Gary Stone (GS 5563)  
Attorney for the Plaintiff

cc: Christopher B. Brown, Esq.  
Kevin G. Horbatiuk, Esq.  
Allan M. Marcus, Esq.